

Magistrate Judge J. Richard Creatura

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UNITED STATES OF AMERICA,
Plaintiff

v.

ALLEN D. LINT,

Defendant.

NO. MJ18-5085

COMPLAINT FOR VIOLATION
21 U.S.C. § 841(a)(1), (b)(1)(A)

BEFORE, J. Richard Creatura, United States Magistrate Judge, U. S. Courthouse,
Tacoma, Washington.

The undersigned complainant being duly sworn states:

COUNT 1
(Possession of LSD with Intent to Distribute)

On or about September 28, 2017, at Pierce County, within the Western District of
Washington, ALLEN D. LINT knowingly and intentionally did possess, with intent to
distribute, lysergic acid diethylamide ("LSD"), a substance controlled under Schedule I,
Title 21, United States Code, Section 812.

1 It is further alleged that this offense involved 10 grams or more of a mixture or
2 substance containing a detectable amount of LSD.

3 All in violation of Title 21, United States Code, Sections 841(a)(1) and
4 841(b)(1)(A).

5 The undersigned complainant, Michael Fischlin, a Postal Inspector with the United
6 States Postal Inspection Service ("USPIS") being duly sworn, further deposes and states
7 as follows:

8 **INTRODUCTION**

9 1. I am a Postal Inspector with the USPIS and have been so employed since
10 June 2016. I am currently assigned to the Seattle Division, Prohibited Mail Narcotics
11 Team, where I investigate controlled substances transported via the United States Mail. I
12 have attended a one-week training course presented by the USPIS addressing narcotics
13 investigations and trends in narcotics mailings. At that training, subject matter experts
14 taught current trafficking trends and suspicious parcel recognition.

15 2. Prior to becoming a Postal Inspector, I was employed as a Special Agent of
16 the United States Secret Service ("USSS"). As part of my training, I completed the
17 Federal Law Enforcement Training Center ("FLETC") Criminal Investigator Training
18 Program as well as the USSS Special Agent Training Program. While employed by the
19 USSS, I was trained in computer forensics. Prior to joining the USSS, I served four
20 years of active duty in the United States Marine Corps as a military policeman.

21 3. As a Postal Inspector, I am authorized to investigate crimes involving
22 federal offenses relating to the U.S. Postal Service. During the course of my law
23 enforcement career, I have conducted or participated in criminal investigations involving
24 access device fraud, bank fraud, computer fraud, counterfeit currency and securities,
25 identity theft, illegal narcotics, mail theft, robbery, and wire fraud. My duties have
26 included planning the execution of search warrants; securing and searching premises;
27 seizing documents, records and other evidence; and interviewing witnesses.

1 4. The facts set forth in this Affidavit are based on my own personal
2 knowledge; information obtained from other individuals during my participation in this
3 investigation, including other law enforcement officers; review of documents and records
4 related to this investigation; communications with others who have personal knowledge
5 of the events and circumstances described herein; and information gained through my
6 training and experience.

7 5. Because this Affidavit is submitted for the limited purpose of establishing
8 probable cause in support of a criminal complaint, it does not set forth each and every
9 fact that I, or others, have learned during the course of this investigation.

10 6. As discussed below, ALLEN LINT was selling drugs on the dark web
11 under the handle "llamadaddy." LINT also purchased drugs on the dark web under the
12 handle "Northwest Wizard" that he then further distributed. Finally, LINT possessed in
13 his residence and elsewhere drugs that he intended to distribute, including 29.64 grams of
14 cardstock containing approximately 3,683 doses of LSD.

15 **SUMMARY OF PROBABLE CAUSE**

16 **A. The Dark Web**

17 7. The Onion Router" or "TOR" network is a special network of computers on
18 the Internet, distributed around the world, that is designed to conceal the true Internet
19 Protocol ("IP") addresses of the computers accessing the network, and thereby the
20 locations and identities of the network's users. TOR likewise enables websites to operate
21 on the network in a way that conceals the true IP addresses of the computer servers
22 hosting the websites, which are referred to as "hidden services" on the TOR network.
23 Such "hidden services" operating on TOR have complex web addresses, which are many
24 times generated by a computer algorithm, ending in ".onion" and can only be accessed
25 through specific web browser software designed to access the TOR network. Most
26 "hidden services" are considered dark web services with no legitimate or identified
27 service provider to which legal process may be served.
28

8. There are a number of marketplaces that have appeared on the dark web that have offered contraband for sale, including narcotics. Users typically purchase narcotics through these marketplaces using digital currency such as bitcoin.

9. Bitcoin is a type of digital currency. Bitcoin payments are recorded in a public ledger that is maintained by peer-to-peer verification and is thus not maintained by a single administrator or entity. Bitcoins are widely used to conduct both legitimate and unlawful business. For example, Microsoft accepts bitcoins as payment for Xbox games and services. On the other hand, bitcoins were the payment used on the Silk Road, a website on the dark web that offered drugs and other contraband for sale.

B. Cooperating Defendant #1

10. Based on my investigation, and information relayed to me by other law enforcement personnel, I am aware that in May 2017, federal agents executed a search of the residence of Cooperating Defendant #1 ("CD1").¹ CD1 admitted that he/she was a vendor on the dark web. CD1 also advised agents that he/she had sold MDMA to a person using the moniker "Northwest Wizard" via a dark web site that sold, among other things, narcotics. CD1 said that CD1 had sold drugs to Northwest Wizard² on fifteen to twenty occasions, and that the quantities had increased over time, up to approximately 150 grams of LSD. For each transaction, Northwest Wizard paid for the drugs using bitcoins. CD1 said that CD1 mailed the drugs to Northwest Wizard using the name and address of: Christina Wynn 3024 112th Street East, Tacoma, Washington 98446.

11. CD1 said that CD1 frequently communicated with Northwest Wizard via encrypted messaging. According to CD1, Northwest Wizard indicated that he/she was reselling drugs. Specifically, Northwest Wizard said that he/she had purchased a recreational vehicle with the proceeds from the sale of one of the orders of MDMA that

¹ CD1 provided information in the hope of receiving reduced charges or to avoid being charged at all. CD1 was involved in narcotics trafficking, and the Court should assume that CD1 had a drug problem, and a prior criminal history that involved acts of dishonesty.

² It appears that the user of Northwest Wizard often used the moniker as a single word. For ease, two separate words are used in this Affidavit.

1 CD1 had sold him/her.

2 **C. Cooperating Defendant #2**

3 12. In August 2017, federal agents arrested Cooperating Defendant #2
4 (“CD2”), who admitted to selling fentanyl on multiple dark web markets.³ CD2 said that
5 CD2 knew of a person using the moniker “NW Wizard” who purchased fentanyl on the
6 dark web and also sold LSD on the dark web.

7 13. CD2 stated that CD2 delivered fentanyl in person to a man CD2 believed
8 was “NW Wizard” and that the address and telephone number for NW Wizard was saved
9 in one of CD2’s cellphones as “Wizard” or “Wizards.” CD2 stated that NW Wizard lived
10 in a house in Tacoma with two women and CD2 believed they were in an open
11 relationship.

12 14. A search of CD2’s telephones revealed that a contact was saved on both
13 telephones as “Wizards.” On CD2’s iPhone 5 the contact was saved as “Wizards” with a
14 telephone number of (206) 313-3546, and on the iPhone 6 the contact was saved as
15 “Wizards” with an address of 3024 112th St. E, Tacoma, WA 98446. Using local and
16 law enforcement databases, a federal agent found that telephone number (206) 313-3546
17 is associated with a woman by the name Christina Marie Collins Wynn.

18 **D. The Philadelphia Investigation**

19 15. In September 2017, federal agents approached a person on the east coast
20 who admitted to being a dark web vendor, hereafter confidential source 1 (“CS1”).⁴ CS1
21 told agents he/she used a dark web marketplace to sell fentanyl. CS1 told agents that a
22 person in the Seattle, Washington area with a moniker “Northern Wizard”⁵ had ordered
23

24
25 ³ As with CD1, CD2 provided information in the hope of receiving reduced charges or to avoid being charged at all. CD2 was involved in narcotics trafficking, and the Court should assume that CD2 had a drug problem, and a prior criminal history that involved acts of dishonesty.

26 ⁴ CS1 provided information in the hope of receiving reduced charges or to avoid being charged at all. CS1 was involved in narcotics trafficking, and the Court should assume that CS1 had a drug problem, and a prior criminal history that involved acts of dishonesty.

27 ⁵ It appears that CS1 misspoke and meant “Northwest Wizard” because CS1 later showed orders with that moniker as opposed to “Northern Wizard.”

1 gram amounts of fentanyl from CS1 in the past. CS1 further explained that “Northern
2 Wizard” would typically order four grams of fentanyl about one to two times per week. I
3 know, based on my training and experience, and my consolation with other agents
4 involved in drug cases, that these quantities over this time-period are distribution-level
5 quantities of fentanyl.

6 16. Further information obtained from CS1 showed at least nine recent
7 packages sent to Christina Wynn at 3024 112th Street East, Tacoma, Washington 98446.
8 CS1 told agents that all of those shipments contained fentanyl.

9 17. Agents assumed CS1’s identity on a dark web marketplace. On or about
10 September 19, 2017, an HSI undercover agent (“UCA”) acknowledged an order for six
11 grams of fentanyl and 250 milligrams of carfentanil to a person using the moniker
12 “Northwest Wizard.” The UCA communicated with Northwest Wizard via encrypted
13 messaging. In the conversation, Northwest Wizard asked the UCA about a two-gram
14 shipment of fentanyl that was never received, and if she could order four grams more.
15 The UCA said he would do a custom order, replacing the two grams not yet received, and
16 adding four additional grams. The UCA offered all six grams of fentanyl for \$2,400, to
17 which Northwest Wizard agreed. Northwest Wizard then asked if the UCA had any
18 carfentanil, while also providing the shipping address for the order as follows:

19 Christina Wynn
20 1521 S. 55th St.
21 Tacoma, WA 98408

22 18. The UCA then told Northwest Wizard that he could supply 250 milligrams
23 of carfentanil for \$400; \$2,800 total for the whole order, and that it would be shipped in
24 one package. Northwest Wizard then asked the UCA for a bitcoin wallet address to send
25 payment to, which the UCA provided. On or about September 24, 2017, the UCA
26 informed Northwest Wizard of receipt of 0.7620481 bitcoin. Northwest Wizard asked
27 the UCA to double package the order (one envelope folded inside another envelope), and
28 for the package to be sent overnight express. The UCA told Northwest Wizard that he

1 had been having problems with United States Postal Service ("USPS") lately and that he
2 would mail the parcel on Monday (*i.e.*, September 25, 2017).

3 **E. LINT's Facebook Page**

4 19. As discussed below, agents conducted a controlled delivery of the package
5 that Northwest Wizard had ordered. Prior to the delivery, agents conducted surveillance
6 of the residences associated with Northwest Wizard. During surveillance, agents
7 observed multiple people, including Wynn and ALLEN LINT.

8 20. On September 26, 2017, I located a Facebook profile under the name of
9 Allen Lint (Avvy). The profile picture for the account was of a white male and two white
10 females. The male strongly resembled LINT, and one of the females strongly resembled
11 Wynn. Under the account details section was the text: "just a deadhead trying to make it
12 after serving federal prison time for LSD. I am finishing my last 6 months in the custody
13 of halfway house hopefully to be on house arrest in Spokane in the next couple weeks.
14 Got my first visit home today and setup this facebook." I located a photograph of a
15 business card uploaded to the Facebook account on April 14, 2017. The card was in the
16 name of ALLEN LINT, with a title of "Bitcoin Investment Consultant." The card listed
17 several pieces of contact information, to include a Wickr profile of "northwestwizard"
18 and an e-mail address of "pinkavvy@hotmail.com".

19 21. According to court records, LINT was sentenced to 66 months of
20 imprisonment and five years of supervised release on September 11, 2008, for
21 distribution of LSD. His term of supervised release expired in April 2017.

22 **F. The Controlled Delivery and Search Warrant**

23 22. On September 28, 2017, agents delivered a package of sham fentanyl and
24 carfentanil to 1521 S. 55th Street, Tacoma, Washington 98408. Agents then immediately
25 executed a federal search warrant at the premises.

26 //

27 //

28 //

1 23. ALLEN LINT, Christina Wynn,⁶ and others appeared to be residing in the
2 residence. Agents observed in the kitchen, as well as the dining table, devices and
3 material typically used in the distribution of controlled substances via the U.S. mail.
4 Specifically agents observed (1) an unknown suspected controlled substance in rock form
5 in a cellophane pouch, (2) an unknown suspected controlled substance in liquid form
6 contained in various vials, (3) a canister of methyl-sulfonyl-methane (frequently used as a
7 cutting agent for methamphetamine), (4) boxes of latex gloves, (5) a small scale, (6)
8 plastic bags of various sizes, (7) heat/vacuum sealing machine, (8) packing tape, (9)
9 unused USPS mail parcels/envelopes, (10) shipping labels, (11) a list of dozens of names
10 and addresses along with hand-written notes depicting amounts and types of controlled
11 substances next to each name, (12) and a trash can full of used packing materials, used
12 rolls of packing tape, used rubber gloves, and other trash. Agents also located a business
13 card in the name of LINT, with a title of "Bitcoin Investment Consultant." The card
14 listed several types of contact information, including a Wickr profile of
15 "northwestwizard" and an e-mail address of "pinkavvy@hotmail.com." This business
16 card was the same business card seen on LINT's Facebook page.

17 24. Agents also discovered in the residence additional suspected controlled
18 substances; specifically, fentanyl, carfentanil, LSD, MDMA, psychedelic mushrooms,
19 black tar heroin, and other miscellaneous controlled substances. U.S. currency and other
20 monetary instruments, as well as documentary evidence of controlled substances
21 trafficking, such as packaging materials, drug paraphernalia, scales, and ledgers
22 (customer lists), were also seized from the residence.

23 25. ALLEN LINT was interviewed on the scene after he provided his written
24 consent and waiver of his constitutional rights to have an attorney present during
25

26 _____
27 ⁶ On November 9, 2017, police responded to 1521 S. 55th Street, Tacoma, Washington 98408, *i.e.*, the residence
28 referenced throughout this subsection. When law enforcement arrived at the residence, they learned that Christina
Wynn had died. ALLEN LINT and others were at the residence. Wynn's cause of death has not been officially
determined by State of Washington authorities at this time.

1 questioning. LINT told agents that he was the dark web marketplace user named
2 "Northwest Wizard," and that he conducted purchases of controlled substances from
3 other dark web marketplace vendors and paid for them with bitcoin. LINT stated he
4 purchased fentanyl on the Dream Market dark web market. LINT also told agents that he
5 sold drugs at various music festivals.

6 26. Agents asked LINT if he had bitcoins in a bitcoin wallet on his cellular
7 phone, to which LINT replied that he did. A federal agent retrieved LINT's Samsung
8 Galaxy S6 (hereinafter "LINT's Galaxy S6") phone from the evidence custodian, and
9 asked LINT if he would unlock the phone using his thumbprint, to which LINT replied
10 that he would. After LINT unlocked the phone, a federal agent browsed the applications
11 ("apps") on the phone. A federal agent discovered the app Mycelium, which is a bitcoin
12 wallet app. A federal agent asked LINT for permission to open the app, to which LINT
13 said yes. A federal agent touched the Mycelium icon which opened the app to the
14 wallet's main balance screen. A federal agent observed a bitcoin balance of 3.8357743
15 bitcoins, with a value at the time of \$15,649.81. LINT allowed agents to also view the
16 "transactions" screen, which showed dozens of transactions both inbound and outbound
17 from the bitcoin wallet.

18 27. A variety of suspected controlled substances seized from LINT's residence
19 were submitted to the USPIS Forensic Laboratory for analysis. At the time of this
20 writing, analysis of some of the evidence has been completed. Laboratory analysis of the
21 cardstock showed that it contained LSD. The net weight of this cardstock was
22 approximately 29.64 gram and contained and an estimated 3,683 doses. Additional
23 cardstock was found to contain N, N-dimethyltryptamine, which is a Schedule I
24 controlled substance. Finally, laboratory analysis of a blue tablet labeled "STP" was
25 found to contain MDMA and 4-chloro-2, 5-dimethoxyamphetamine ("DOC"), which are
26 Schedule I controlled substances.

27 //

28 //

1 **G. Shipping Labels**

2 28. During the search warrant, agents seized twenty-six printed USPS shipping
3 labels. The return address on each of the labels listed "GR Wholesale Gifts" or "GR
4 Wholesale" with the same return address in Tacoma, Washington. The labels were
5 addressed to people throughout the country. Investigation revealed that the labels were
6 purchased via Stampnik. Stampnik is a service that allows people to print shipping labels
7 from their home and pay with bitcoin.

8 29. Stampnik records showed that all of the labels were part of multi-label
9 orders that were placed using the e-mail address "llamadaddy@protonmail.com."⁷ These
10 same records showed that the e-mail "llamadaddy@protonmail.com" was associated with
11 approximately 648 Stampnik shipping labels. Significantly, each of these shipping labels
12 had a return address in Tacoma, Washington that was either fictitious or belonged to a
13 closed business. These labels had return shipping addresses from various closed or
14 fictitious businesses in Tacoma, Washington, and were addressed to individuals
15 throughout the United States.

16 30. As noted above, during the execution of the search warrant, law
17 enforcement seized a ledger that contained names, addresses, and quantities of controlled
18 substances believed to have been shipped to customers. This ledger contained
19 approximately 114 names and addresses. Stampnik records showed that the account
20 "llamadaddy@protonmail.com" was used to purchase and create shipping labels
21 addressed to each of the 114 names on the ledger.

22 31. Stampnik records included USPS labels allegedly sent by US Gold and
23 Collectables [sic] with at least two different return addresses. One of the return addresses
24 associated with these Stampnik labels was 3024 112th St E, Tacoma, Washington.
25 During surveillance preceding the execution of the search warrant, a law enforcement
26

27 ⁷ Based upon my training and experience, I know that ProtonMail is an encrypted e-mail service used by many
28 darkweb vendors, as it is based out of Switzerland with servers outside of the jurisdiction of the United States.

1 officer had seen a person resembling LINT at this address. Furthermore, according to
2 Washington State Department of Licensing records, LINT listed this as his home address
3 on his driver's license.

4 **H. Identification of LINT's customer A.P.**

5 32. As discussed above, a ledger seized from LINT's residence contained the
6 names and addresses of 114 of LINT's suspected customers. One of the individuals
7 listed on the ledger was "A.P." The phrase "10, 1st class" appeared above A.P.'s name
8 and address. Stampnik records show that on August 14, 2017, user
9 "llamadaddy@protonmail.com" ordered postage for a shipment from US Gold And
10 Collectables [sic] to A.P. in Alabama.

11 33. On or about October 20, 2017, Army CID executed a warrant at A.P.'s
12 residence in Alabama. The warrant resulted in the discovery of marijuana, cannabidiol
13 oil, and marijuana edibles. Also seized from the residence was an Apple iPhone.

14 34. A search warrant was subsequently obtained to search the Apple iPhone.
15 Analysis of the iPhone revealed text messages with another subject regarding controlled
16 substances sold by "llamadaddy." One text message from G.C. included the text
17 "Llamadaddy is back from vacay and he's got some awesome new stuff." The text
18 message included a screenshot of a listing by llamadaddy offering LSD for sale on the
19 Dream Market dark web marketplace. The first line of the product description was
20 "300ug White on White Unperf FAMILY LSD!!!" The screenshot showed llamadaddy
21 had 1,600 reviews with a 4.95 out of 5 rating. The image for the product was a skull
22 filled with a flower, which appeared to be a variation of a logo for the band The Grateful
23 Dead.

24 35. Another text message from G.C. included a screenshot of the terms and
25 conditions section for a profile that, based upon my training and experience, I recognized
26 as the terms and conditions section for Dream Market. The terms and conditions seen in
27 the screenshot include the text, "incase dream goes down: llamadaddy@protonmai.com,"
28 and "If you want to check tracking, please make sure it has been at least 7 days since you

1 ordered and send me a message or preferable an email at llamadaddy@protonmail.com
2 with your order info and shipping info and I will check your tracking asap and get back to
3 you. thanks!"

4 **I. llamadaddy Dream Market Profile**

5 36. On November 22, 2017, I navigated to Grams, which is a search engine on
6 the dark web. I conducted an InfoDesk query for llamadaddy. The query revealed
7 llamadaddy was a vendor on Dream Market.⁸ In addition, the query showed the Pretty
8 Good Privacy ("PGP") public key for llamadaddy.

9 37. Based upon my training and experience, I know that PGP is used on dark
10 web markets to encrypt communications between vendors and customers. When a
11 customer orders from a vendor or sends a vendor a message on a dark web market, that
12 information may be stored in the marketplace's database. Given concerns that the
13 marketplace server may be hacked or seized by law enforcement, vendors and customers
14 often communicate via PGP encrypted devices to address this security problem.

15 38. A vendor has both a PGP private key and a public key. A customer can use
16 the vendor's public key to encrypt a message. The vendor then uses their private key to
17 decrypt the message. Vendors keep their private key secure but not their public key,
18 which they put on their profile. This is done so customers may use a vendor's PGP
19 public key to encrypt data sent to the vendor, such as the customer's name and address.
20 Only the corresponding PGP private key, held by the vendor, can decrypt the data.

21 39. I subsequently reviewed a screenshot of the PGP public key for Northwest
22 Wizard, which had been taken by an HSI UCA when the UCA accepted an order from
23 Northwest Wizard on Dream Market. I compared the PGP public keys for Northwest
24 Wizard and llamadaddy. The PGP public key for both accounts matched, which meant
25 they were controlled by the same person or persons.⁹

26
27 ⁸ InfoDesk is a collector of dark web vendor identities.

28 ⁹ It is unknown for what period of time the Northwest Wizard and llamadaddy accounts shared the same PGP keys.
However, based upon investigation in this case, I know that the llamadaddy account used at least one different PGP

40. On December 13, 2017, I reviewed the Facebook profile under the name of “Allen Lint (Avvy).” I located a photograph of LINT in which a tattoo can be seen on his chest. The tattoo is of the lightning skull logo, with wings, and the word “FAMILY” above the skull. The lightning skull logo is cover art from an album by The Grateful Dead. The tattoo resembled the image for product sold by llamadaddy on Dream Market, as seen on the Apple iPhone recovered from A.P.’s home.

41. On February 2, 2018, I located the llamadaddy vendor account on Dream Market dark web website. The llamadaddy account showed a status of “on vacation” with a last active date of September 29, 2017. It should be noted this was one day after the search warrant was executed at LINT’s residence. Dream Market showed llamadaddy had joined the market on May 23, 2016. The llamadaddy account had 1,700 reviews with a 4.93 out of 5 rating. Due to my experience, I know that a review is generally associated with an order, suggesting that llamadaddy had fulfilled 1,700 orders in approximately a sixteen-month period. The profile picture for the account was of a llama.¹⁰

42. The llamadaddy account had three pages of product listings on the Dream Market. I was able to review the first page of product listings. The products included LSD, MDMA, and cannabis. The listings by llamadaddy on Dream Market showed the products would be shipped via USPS.

43. The LSD listings included a product image of a skull filled with a flower, which appeared to be a variation of a logo for the band The Grateful Dead. This was the same logo associated with the llamadaddy listing found on A.P.’s Apple iPhone. A listing by llamadaddy for Starburst Crush high grade cannabis included the product

key. Specifically, on February 2, 2018, I visited the llamadaddy account. At that time, a different PGP key was associated with the account than the one referenced in the above paragraph.

¹⁰ On LINT’s Facebook page, there is a photograph that was uploaded on December 21, 2015, in which LINT is wearing a shirt with the word “llama.”

1 description "Grown in greenhouse in the Pacific Northwest. Organic and flushed well.
2 Tastes great and very good high."

3 44. Another listing was for 1 x 4mg STP ACID Microdot Barrel (DOM), which
4 included an image of tablets labeled "STP." The photograph for the listing was a pile of
5 blue and pink tablets on a white surface labeled "STP." The first sentence of the product
6 description was "STP is a type of "acid" that has a rich history in the psychedelic world."
7 It should be noted that tablets labeled "STP" were recovered during the execution of the
8 search warrant at LINT's residence in September 2017. As noted, these tablets were
9 found to contain MDMA and DOC.

10 **J. Search of LINT's Galaxy S6**

11 45. On January 17, 2018, a federal search warrant was obtained authorizing the
12 search of two cell phones that were seized from LINT's residence in September 2017.
13 One of the phones was LINT's Galaxy S6 that he had unlocked and showed agents.

14 46. During review of LINT's Galaxy S6, numerous text messages were located
15 which related to the dark web and the sale of narcotics thereon. For example, the phone
16 included the saved contact "Likia Macaffee." The number associated with this contact
17 was (XXX) XXX-4366 (hereinafter "MACAFFEE PHONE"). I observed the following
18 text message sent to MACAFFEE PHONE on December 13, 2016 (all times in Pacific
19 Time):

20 LINT's Galaxy S6: 11:38 AM "I have lsd on blotter, in water, and in
21 alcohol. And i have barn grown cyanescens
22 mushrooms. Also have DOM aka STP. Also 2c-T-7.
23 Also mecaline hcl. Lots of others too"

24 47. I observed the following exchange with an unnamed contact at number
25 (XXX) XXX-2095 ("hereinafter "UNNAMED CONTACT") on January 14, 2017:

26 UNNAMED CONTACT: 4:53 PM "Fwd: Vial of the best tasteless liquid lsd.
27 And an oz of mdma. I want the same 1 as last time or
28

1 same quality please dnt wana go bak to selling that
2 powder he”

3 UNNAMED CONTACT: 4:53 PM “Fwd: gave me. The rock mdma is choice.
4 Great feedback”

5 UNNAMED CONTACT: 5:06 PM “HI wiz. What do you have available? You
6 haven’t had any ketamine. If and when you get any
7 please let me know. Those texts I forwarded to you are
8 from my kid”

9 LINT’s Galaxy S6: 5:43 PM “I have the good tasteless needlepoint lsd in
10 stock in water, alcohol, or blotter. Also have the old
11 metallic tasting silver LSD in alcohol or blotter. I’m
12 about to make an order for some of that good Rocky
13 MDMA from my same dude that sent the last time to
14 you guys Direct. Can get k from him too. I’ll check
15 prices and let you know”

16 UNNAMED CONTACT: 5:50 PM “Thanks wiz”

17 48. The phone also contained the name “Josh K.” The number associated with
18 the contact was (XXX) XXX-3301 (hereinafter “JOSH PHONE”). I observed the
19 following text messages sent to JOSH PHONE on March 2, 2017:

20 LINT’s Galaxy S6: 2:37 PM “I’ve been selling online and got people who
21 order lbs of weed and 5 packs here and here, lbs of oil
22 occasionally too. If you’re willing to seal and ship a lb
23 here and there to an address I send you, that would be
24 awesome. I could just send you the order and address
25 and pay you directly and you can ship it directly
26 instead of me needing to go down to Oregon and pick
27 something up and then shipping it or somebody
28 bringing something and shipping it”

1 LINT's Galaxy S6: 2:40 PM "All darknet and secure lol"

2 49. I observed the following exchange between the LINT's Galaxy S6 and the
3 MACAFFEE PHONE on July 21, 2017:

4 LINT's Galaxy S6: 10:06 PM "See what's happening online? Darknet
5 markets takedown"

6 MACAFFEE PHONE: 10:06 PM "No, was it in the news? What were they
7 doing?"

8 MACAFFEE PHONE: 10:07 PM "Will that effect you?"

9 LINT's Galaxy S6: 10:10 PM "Yes"

10 MACAFFEE PHONE: 10:10 PM "That's scary"

11 MACAFFEE PHONE: 10:11 PM "Did you use Alpha Bay?"¹¹

12 LINT's Galaxy S6: 10:12 PM "No but dream"

13 LINT's Galaxy S6: 10:12 PM "It is not down but there is speculation
14 about it being compromised"

15 MACAFFEE PHONE: 10:13 PM "What happens next? Are there any
16 effective counter methods?"

17 LINT's Galaxy S6: 10:14 PM "Don't know"

18 MACAFFEE PHONE: 10:17 PM "How serious is this for you?"

19 LINT's Galaxy S6: 10:24 PM "Don't know yet. 99% of income"

20 50. I observed the following exchange between LINT's Galaxy S6 and
21 MACAFFEE PHONE on September 14, 2017:

22 MACAFFEE PHONE: 3:14 PM "Hi love, is there a tracking number for Elias'
23 package? He just checked the PO Box and it's not
24 there. He is leaving tomorrow and needs to figure out
25 how"

27 ¹¹ Based upon my training and experience, I know that AlphaBay was a website on the dark web that offered drugs
28 and other contraband for sale. Furthermore, I know that AlphaBay was seized by U.S. law enforcement in early July
2017 and that the specifics of the seizure were released to the public on or about July 20, 2017.

1 LINT's Galaxy S6: 3:17 PM "I thought he was leaving Saturday? I'll be
2 home in about an hour and I'll look up tracking"
3 MACAFFEE PHONE: 3:18 PM "Nope, he comes home tomorrow"
4 LINT's Galaxy S6: 3:19 PM "Hopefully he gets it before he leaves it takes
5 a few days to get to alaska even express. They said it
6 would be either today or tomorrow"
7 MACAFFEE PHONE: 3:21 PM "Oh shoot. I thought you said wed/thurs.
8 Hmmm. Not sure what to do. Ok, I'll let him know.
9 Thank love, xoxo"
10 LINT's Galaxy S6: 4:17 PM "Hmm its looking like it didn't even start
11 moving until the next day tho when I bought the
12 postage they said that the days express hadn't gone it
13 yet :/ but its saying tomorrow"
14 LINT's Galaxy S6: 4:18 PM "92055901755477000026861225"
15 MACAFFEE PHONE: 4:32 PM "Ok thanks for checking :) Is the return
16 address any good?"
17 MACAFFEE PHONE: 4:32 PM "What exactly is in the box?"
18 LINT's Galaxy S6: 4:34 PM "No the return address is to a random store"
19 LINT's Galaxy S6: 4:34 PM "7g clear, 2oz mushrooms"
20 MACAFFEE PHONE: 4:43 PM "Oh good, I think can get rid of that in an
21 hour or two and make it to the plane no problem :)"
22 MACAFFEE PHONE: 4:43 PM "Problem solved :)"
23 MACAFFEE PHONE: 4:43 PM "*he can"
24 LINT's Galaxy S6: 4:45 PM "Awesome ;)"

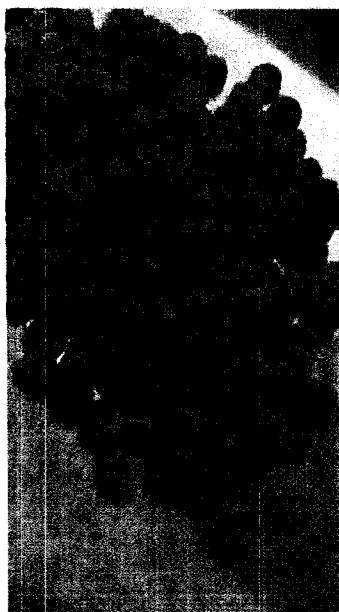
25 51. Stampnik records showed that the label mentioned above,
26 92055901755477000026861225, was one of the labels ordered by
27 llamadaddy@protonmail.com. Stampnik records showed the label was addressed from
28 HH Gifts, 3109 6th Avenue, Tacoma, Washington to Elias Nelson, PO Box 449, Yakutat,

1 Alaska. Based upon an open source search, I was not able to locate the business "HH
2 Gifts" in the State of Washington.

3 52. In addition to the above note text messages, law enforcement recovered
4 from LINT's Galaxy S6 a digital photograph of a pile of blue and pink tablets on a white
5 surface labeled "STP." Metadata associated with the photograph shows that it was taken
6 on March 2, 2017, and that the device used to take the photograph was a Samsung Galaxy
7 S6. Additionally, a minute after the picture was taken, LINT's Galaxy S6 sent a message
8 to "pinkavvy@hotmail.com" with the photograph as an attachment. The email address
9 "pinkavvy@hotmail.com" was the e-mail address on the business card in LINT's name
10 that was found during the search of his residence in September 2017.

11 53. As can be seen below, this photograph matches the photograph used for the
12 llamadaddy listing of STP ACID Microdot Barrel (DOM) on Dream Market:

13 Photograph from LINT's Galaxy S6:



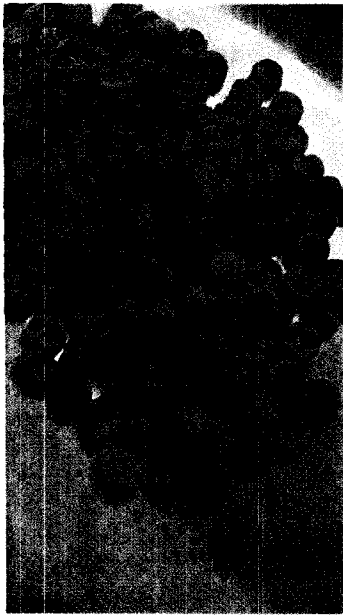
25 //

26 //

27 //

28 //

1 Photograph from Dream Market llamadaddy listing:



12 **K. Public Storage Unit**

13 54. On December 1, 2017, I learned that the Pierce County Sheriff's Office had
14 been contacted by a concerned citizen who had purchased an auctioned storage unit from
15 Public Storage in Puyallup, Washington. Upon reviewing the contents of the unit, the
16 citizen found suspected controlled substances and documents in the name of LINT. The
17 citizen subsequently contacted the Pierce County Sheriff's Office and provided Deputy
18 Nordstrom with the contents of the storage unit.

19 55. On December 4, 2017, I retrieved the storage unit contents from Deputy
20 Nordstrom. I transported the items to the USPIS Seattle Division Headquarters and
21 secured them within the evidence vault. Among the items obtained from the storage unit
22 were several suspected controlled substance, including LSD. In addition, there were
23 several documents in the name of LINT with an address of 2359 Franklin Ave E Unit A,
24 Seattle, WA.

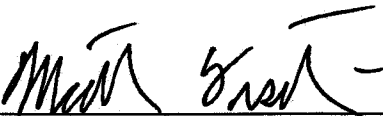
25 56. Several documents recovered from the storage unit in LINT's name were
26 submitted to the HSI Forensic Laboratory for latent print evidence. Eighteen latent finger
27 impressions of comparative value were developed. A comparison of the latent finger
28

1 impressions versus the known print impressions of LINT was completed. Fifteen of the
2 latent finger impressions developed have been identified as the fingerprints of LINT.

3 57. Plastic wrappings in which suspected LSD was found were also submitted
4 to the HSI Forensic Laboratory for latent print evidence. Nine latent finger impressions
5 of comparative value were developed. A comparison of the latent finger impressions
6 versus the known print impressions of LINT was completed. Eight of the latent finger
7 impressions developed have been identified as the fingerprints of LINT.

8 **CONCLUSION**

9 58. Based on the foregoing, I respectfully submit that there is probable cause to
10 believe that LINT committed the crime of possession of LSD with intent to distribute, in
11 violation of Title 18, United States Code, Sections 841(a)(1) and (b)(1)(A).

12
13
14 

15 MICHAEL FISCHLIN, Complainant
16 Inspector, USPIS

17
18 Based on the Complaint and Affidavit sworn before me pursuant to CrimRule 4.1,
19 the Court hereby finds that there is probable cause to believe the Defendant committed
20 the offense set forth in the Complaint.

21
22 Dated this 4th day of April, 2018.

23
24
25 

26 J. RICHARD CREATURA
27 United States Magistrate Judge
28